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U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

TYRON F. KEMP,

Defendants.

4:18CR903 AGF/JMB

INDICTMENT

COUNT ONE

The Grand Jury charges that:

On or about January 21, 2015, in the Eastern District of Missouri and elsewhere,

TYRON F. KEMP,

the defendant, did make and present to the Internal Revenue Service, an agency of the Department of the Treasury, a claim against the United States for payment of a refund of income taxes in the amount of five thousand three hundred and ninety dollars (\$5,390.00) for the year 2014, knowing that the claim was false, fictitious and fraudulent as to a material matter, in that TYRON F. KEMP, the defendant herein, did prepare a U.S. Individual Income Tax Return (Form 1040A) in the name of BD for the year 2014 which stated that BD was entitled to a refund of income taxes in the amount of five thousand three hundred and ninety dollars (\$5,390.00) for the year 2014 when, in truth and fact, as TYRON F. KEMP, the defendant herein, well knew, BD was not entitled by this claim to receive a refund of income taxes in the amount of five thousand three hundred and ninety dollars (\$5,390.00) for the year 2014.

In violation of Title 18, United States Code, Section 287.

COUNT TWO

The Grand Jury further charges that:

On or about February 3, 2014, in the Eastern District of Missouri and elsewhere,

TYRON F. KEMP,

the defendant, did make and present to the Internal Revenue Service, an agency of the Department of the Treasury, a claim against the United States for payment of a refund of income taxes in the amount of five thousand and forty-four dollars (\$5,044.00) for the year 2013, knowing that the claim was false, fictitious and fraudulent as to a material matter, in that TYRON F. KEMP, the defendant herein, did prepare a U.S. Individual Income Tax Return (Form 1040A) in the name of BD for the year 2013 which stated that BD was entitled to a refund of income taxes in the amount of five thousand and forty-four dollars (\$5,044.00) for the year 2013 when, in truth and fact, as TYRON F. KEMP, the defendant herein, well knew, BD was not entitled by this claim to receive a refund of income taxes in the amount of five thousand and forty-four dollars (\$5,044.00) for the year 2013.

In violation of Title 18, United States Code, Section 287.

COUNT THREE

The Grand Jury further charges that:

On or about May 23, 2014, in the Eastern District of Missouri and elsewhere,

TYRON F. KEMP,

the defendant, did make and present to the Internal Revenue Service, an agency of the Department of the Treasury, a claim against the United States for payment of a refund of income taxes in the amount of seven hundred and ninety-four dollars (\$794.00) for the year 2013,

knowing that the claim was false, fictitious and fraudulent as to a material matter, in that TYRON F. KEMP, the defendant herein, did prepare a U.S. Individual Income Tax Return (Form 1040A) in the name of EC for the year 2013 which stated that EC was entitled to a refund of income taxes in the amount of seven hundred and ninety-four dollars (\$794.00) for the year 2013 when, in truth and fact, as TYRON F. KEMP, the defendant herein, well knew, EC was not entitled by this claim to receive a refund of income taxes in the amount of seven hundred and ninety-four dollars (\$794.00) for the year 2013.

In violation of Title 18, United States Code, Section 287.

COUNT FOUR

The Grand Jury further charges that:

On or about January 23, 2014, in the Eastern District of Missouri and elsewhere,

TYRON F. KEMP,

the defendant, did make and present to the Internal Revenue Service, an agency of the Department of the Treasury, a claim against the United States for payment of a refund of income taxes in the amount of five thousand and forty-four dollars (\$5,044.00) for the year 2013, knowing that the claim was false, fictitious and fraudulent as to a material matter, in that TYRON F. KEMP, the defendant herein, did prepare a U.S. Individual Income Tax Return (Form 1040A) in the name of AB for the year 2013 which stated that AB was entitled to a refund of income taxes in the amount of five thousand and forty-four dollars (\$5,044.00) for the year 2013 when, in truth and fact, as TYRON F. KEMP, the defendant herein, well knew, AB was not entitled by this claim to receive a refund of income taxes in the amount of five thousand and forty-four dollars (\$5,044.00) for the year 2013.

In violation of Title 18, United States Code, Section 287.

COUNT FIVE

The Grand Jury further charges that:

On or about April 10, 2014, in the Eastern District of Missouri and elsewhere,

TYRON F. KEMP,

the defendant, did make and present to the Internal Revenue Service, an agency of the Department of the Treasury, a claim against the United States for payment of a refund of income taxes in the amount of five thousand and forty-four dollars (\$5,044.00) for the year 2013, knowing that the claim was false, fictitious and fraudulent as to a material matter, in that TYRON F. KEMP, the defendant herein, did prepare a U.S. Individual Income Tax Return (Form 1040A) in the name of JI for the year 2013 which stated that JI was entitled to a refund of income taxes in the amount of five thousand and forty-four dollars (\$5,044.00) for the year 2013 when, in truth and fact, as TYRON F. KEMP, the defendant herein, well knew, JI was not entitled by this claim to receive a refund of income taxes in the amount of five thousand and forty-four dollars (\$5,044.00) for the year 2013.

In violation of Title 18, United States Code, Section 287.

COUNT SIX

The Grand Jury further charges that:

On or about January 22, 2015, in the Eastern District of Missouri and elsewhere,

TYRON F. KEMP,

the defendant, did make and present to the Internal Revenue Service, an agency of the Department of the Treasury, a claim against the United States for payment of a refund of income taxes in the amount of five thousand three hundred and ninety dollars (\$5,390.00) for the year 2014, knowing that the claim was false, fictitious and fraudulent as to a material matter, in that TYRON F. KEMP, the defendant herein, did prepare a U.S. Individual Income Tax Return

(Form 1040A) in the name of JI for the year 2014 which stated that JI was entitled to a refund of income taxes in the amount of five thousand three hundred and ninety dollars (\$5,390.00) for the year 2014 when, in truth and fact, as TYRON F. KEMP, the defendant herein, well knew, JI was not entitled by this claim to receive a refund of income taxes in the amount of five thousand three hundred and ninety dollars (\$5,390.00) for the year 2014.

In violation of Title 18, United States Code, Section 287.

A TRUE BILL

FOREPERSON

JEFFREY B. JENSEN
United States Attorney

JAMES E. CROWE, JR., 23196MO
Assistant United States Attorney